EXHIBIT 6

CELEST NGEVE UNITED STATES vs STATE OF GEORGIA

July 15, 2022

2	IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION
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4	UNITED STATES OF AMERICA,))
5	Plaintiff,) CIVIL ACTION FILE)
6	-vs-) NO. 1:16-cv-03088-ELR)
7	STATE OF GEORGIA,)
8	Defendant.)
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LO	Deposition of CELEST NGEVE, taken on
L1	behalf of the Plaintiff, pursuant to
L2	Notice and agreement of counsel, in
L3	accordance with the Federal Rules of Civil
L4	Procedure, before Susan M. Shaw, Certified
L5	Court Reporter, at 1250 Oglethorpe Avenue,
L6	Athens, Georgia, on the 15th day of July
L7	2022, commencing at the hour of 9:31 a.m.
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1	reporting to them and keeping them updated on
2	changes and trends that are happening within Rutland
3	Academy.

- So am I correct in understanding 0 from what you just said that one of your responsibilities is supervising and supporting students?
 - Α Absolute -- yes.
- 0 Do you supervise or support students outside of the Rutland Academy environment?
- I don't supervise students outside of Α Rutland Academy, but I do support students outside of Rutland Academy.
 - In what way do you support students outside of Rutland Academy?
 - GNETS directors provide consultative services to the 13 -- to the school systems in which they serve; so those include going out to observe students in other -- in other schools and providing recommendations, therapeutic recommendations in order to make the classroom structure better or in ways to support the teachers as they support the Behavior intervention planning, functional behavior assessment planning, and just different ways of just making sure that those



1	students have better therapeutic services within the
2	school settings.
3	Q Okay. When you say behavioral
4	intervention planning and functional behavioral
5	assessment, do you complete those for students in
6	environments outside of Rutland Academy?
7	A No, I don't complete them, but I assist.
8	Q You assist others in completing them?
9	A That's correct.
10	Q Are the other people who you assist in
11	completing behavioral intervention plans and
12	functional behavioral assessments personnel
13	operating within other school systems?
14	A Yes.
15	Q And would those be the 13 LEAs that you
16	referenced earlier?
17	A Yes.
18	Q In terms of how you support students
19	within Rutland Academy, what does that involve?
20	A Many things. Some of those things include
21	therapeutic walks, talking to them about their
22	progress, helping them understand their goals and
23	objectives and how they're doing with mastering
24	their goals.
25	Sometimes helping with crisis de-escalation,



helping them understand that that one particular moment doesn't have to define their entire day.

Helping them through suicidal ideation as well as homicidal ideation when they're feeling like they have a plan that they want to carry through, as well as contacting, at times, crisis units that may have to support them beyond the school setting.

But also talking to them, providing PBIS supports, going in and doing pop-up surprises just to let them know that we see them doing great things, just as a random moment to see that they're mastering the skills and objectives, as well as just to really -- just talking to them, greeting them on an every-morning basis, talking to them about what kind of things they're having difficulty with and what kind of things they need more support with, but also at times providing support with them after they have met with their therapist. Sometimes their therapist does a great session, and sometimes they're more challenging for them afterwards.

Q Mm-hmm. In terms of how your time as director is divided, what percentage of your time would you say is spent managing and supervising Rutland Academy versus providing the support that you discussed earlier to students that are still in



1	general education settings in one of the 13 LEAs
2	that you referenced?
3	A That varies. It's not always exactly the
4	same. It's kind of month to month, based on what
5	LEAs are needing additional support. Mostly it's 85
6	percent here in the building with the students, 15
7	percent in the districts. But there there are
8	months where there may be additional supports needed
9	in districts. There may be a little more time, you
10	know, going out to them as well.
11	Q And on months where it's more time going
12	out to local school districts, what would you say
13	that split looks like?
14	A About 75 percent in the building and then
15	25 percent out in the district, supporting them.
16	Q Okay. As director of Rutland Academy, do
17	you participate in any regularly scheduled meetings
18	apart from IEPs, IEP meetings?
19	A Yes.
20	Q What are those regularly scheduled
21	meetings that you participate in as director?
22	A Will you clarify on, like, the type of
23	like, what you're asking me exactly?
24	Q Sure. I'm trying to understand if there
25	are individuals that you meet with regularly in the

